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June 12, 2017

VIA ECF

The Honorable Vernon S. Broderick
United States District Judge
Southern District of New York
Thurgood Marshal United States Courthouse
40 Foley Square
New York, New York 10007

Re: *In Re: MTBE Product Liability Litigation*, Master File No. 1:00-1898-VSB, MDL
No. 1358; *Commonwealth of Pennsylvania, et al. v. Exxon Mobil Corp., et al.*,
Case No. 1:14-cv-06228-VSB
Mr. Leron Thumim

Dear Judge Broderick:

Gordon & Rees, LLP (the "Firm") represents certain defendants in the matter of
Commonwealth of Pennsylvania, et al. v. Exxon Mobil Corp., et al., Case No. 1:14-cv-06228-
VSB.

This letter serves to inform the Court that Mr. Leron Thumim, a law clerk to Judge Scheindlin from approximately March 2012 to January 2013, has accepted an offer to join the Firm as an associate. Mr. Thumim was previously employed by a firm representing parties in the MDL after similar notification to Judge Scheindlin. See August 13, 2015 letter from Stephen J. Riccardulli to Judge Scheindlin. The Firm has implemented a Screening Restriction (the "Screen") that will prevent Mr. Thumim from engaging in any work related to any MTBE case or any matters that have been or will be consolidated in MDL 1358. The Screen also prevents Mr. Thumim from communicating with any witness, employee, agent or representative of any entity involved in MTBE or MDL 1358 matters about MTBE or MDL 1358 matters in which the Firm has or will appear. Lastly, the Screen prevents Mr. Thumim from reviewing any documents or other information relating to the MTBE or MDL 1358 matters in which the Firm has or will appear.

Please let us know if Your Honor has any questions related to this Screening Restriction or Mr. Thumim's employment with Gordon & Rees, LLP.

Respectfully submitted,



James L. Messenger

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cc: All counsel of record via ECF